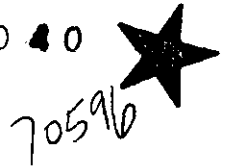


Winnebago Reclamation Service, Inc.

No. 0000040



P.O. Box 2071
Loves Park, Illinois 61130
Office: 815/877-9561
Landfill: 815/874-7375

July 17, 1984

Mr. Richard E. Bartelt,
Chief, Remedial Response Branch
U. E. Environmental Protection Agency
230 South Dearborn St.
Chicago, Illinois 60604

Dear Mr. Bartelt:

Thank you for the opportunity to meet with you and clarify the information used to rank Pagel Pit.

The enclosed booklet for your convenience chronologically lists the events leading to this meeting.

SECTION I - Ecology & Environments HRS Ranking

SECTION II - Roto Rooter

SECTION III- Warzyn HRS Ranking

Very truly yours,

C. J. HOWARD
Winnebago Reclamation Service

CJH/cc

SECTION I

Winnebago Reclamation Service, Inc.

P.O. Box 2071
Loves Park, Illinois 61130
Office: 815/877-9561
Landfill: 815/874-7375

May 31, 1984

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

Attention: Mr. Richard J. Carlson
Director

Dear Mr. Carlson:

Thank you for the opportunity to meet with you on such short notice. The following outlines the events that lead to this meeting.

On May 24th I received the news that Pagel Pit Landfill is being considered for the Super Fund list.

On May 25th I talked with some of your people from the office of Jon Olson (Rockford Sanitary District Director) and a copy of the information you had was forwarded to me.

May 26, 27, 28, I talked with other people in Rockford in this industry and was amazed to hear that a rumor had been circulating for 1½ months that Pagels was going to be a Super Fund Site.

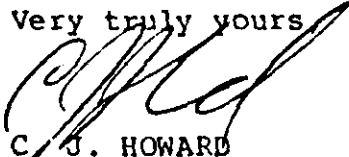
May 29th I went to the U.S.E.P.A. in Chicago and met with Rodney Lynn who is handling the Pagel Pit review. I talked at length to him and he gave me a copy of my file.

May 30th & 31st I spent reviewing my records and the HRS Rating System.

June 1st I will be meeting with you.

The following pages point out what I feel are major errors that should be corrected before this goes any further.

Very truly yours



C. J. HOWARD

Winnebago Reclamation Service, Inc.

CJH/cc

I. COVER SHEET

- A) "Since late 1960's" - I personally supervised the construction of the first cell of Pagel Pit and can attest to the fact that there was never any dumping at that site prior to July 17, 1972. (page 3)
- B) "Porous Blacktop Liner" - Why no mention of the coal tar sealer?
- C) "Was used for drinking by residents in vicinity of site until contamination was evident. Bottled water is now supplied by the site manager." - I decided to provide the water to the neighbors on my own in spite of an I.E.P.A. memorandum dated 8/14/81 that indicated Pagel's was not to blame.

II. "Site accepted 40 - 55 gallon drums of arsenic bearing chemical waste". - I never received those barrels. This permitting was common in the early days of your permitting procedure, where a generator would get more than one permit and then do what he pleased. I have never been asked if I received this waste because it was not part of your pre-manifest system. The permit is attached for your convenience. Mr. Hobbs of Davenport, Iowa verified that the waste was not taken to Pagels. (pages 5,6,7,8)

III. "119,970 Gallons or 1,983.4 drums" - I would appreciate the work sheets that generated these numbers. (page 9)

IV. "Basis of estimating and/or computing waste quantity. Supplemental permits dated Feb. 7&25, March 4&13, 1975, May 3&20, July 19, 1974, and Dec. 3, 1974." (page 9)

Date	Permit #	Description	Received	Page #
Feb. 7&25	75-34	Commercial Wire	No	10-14
Feb. 7&25	75-35	Parson Casket	No	15-17
Feb. 7&25	75-36	Automatic Elec.	No	18-20
Feb. 7&25	75-37	Automatic Elec.	No	21-23
March 4&13	75-80	Midwest Plating	No	24-26
March 4&13	75-81	Midwest Plating	No	27-29
May 3&20	74-72	National Lock	Yes	30-31
July 19	74-107	National Lock	Yes	32-39
Dec. 3, 1974	74-33	Gale Products	No	40-45

1/21/84
3

Facility name:	<u>Pagel's Pit</u>
Location:	<u>Rockford, Illinois</u>
EPA Region:	<u>5</u>
Person(s) in charge of the facility:	<u>Bob Anderson, Winnebago Reclamation Service, Inc.</u>
Name of Reviewer:	<u>MARK LUNSFORD</u>
Date:	<u>December 8, 1983</u>
General description of the facility: (For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)	
<u>Former sand and gravel pit and dolomite quarry used as landfill since late 1960's. Site lined with porous blacktop liner. A shallow, fractured, solutioned, and jointed dolomite bedrock aquifer was used for drinking by residents in vicinity of site until contamination was evident. Bottled water is now supplied to them by the site management.</u>	
Scores: $S_M = 40.7$, $S_{GW} = 70.4$, $S_{SW} = 0$, $S_a = 0$ $S_{FE} = 0$ $S_{DC} = 0$	

FIGURE 1
HRS COVER SHEET

checked by
RJ 1/14/84

FFN

4

10:

DATE:

FROM:

SUBJECT:

☐

New Milford / Pagels Pit

I talked to Mike Bacon, at 4:30 PM, of the Winnebago Co. Health Dept, concerning organic contamination of 4 wells on the east side of Pagels Pit. I told him the information we had obtained so far and he relayed to me the results they obtained on July 2nd from a well located on Acme Solvent property, approx 1/3 mile to the east.

They found: 14 ppb Trichloroethylene
378 ppb Tetrachloroethylene
6 ppb 1,1,1-Trichloroethane

These chemicals were also found in the 4 contaminated wells to the west. This information seems to indicate that the source of problems in the area is the old Acme Solvent Sludge disposal site and not Pagels' Pit. We attempted to sample this well previously (7-29-81) but due to the casing, a bailer could not be extended deep enough to reach the groundwater. In the near future, we will try a new method of obtaining a water sample from this well.

RECEIVED

AUG 25 1981

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

No Photos

No Sketch

GROUND WATER ROUTE

1 OBSERVED RELEASE

Contaminants detected (5 maximum):

Arsenic found in monitoring well that is located downgradient from groundwater mound in Pegel's Pit at 30 and 36 ug/l. Arsenic did not exceed detection limits in any other wells. Source: 10/27/82 sampling & analytical results from (10 ug/l) Rocky Mountain Tech analytical & 11/1/82 sampling & analytical results from Chemtech Lab.

Rationale for attributing the contaminants to the facility:

Site accepted 40-55 gallon drums of arsenic-bearing chemical waste (4)

Sources: Summary sheet of Supplemental Permits granted by Illinois EPA, Division of Land Pollution

Letter from Charles J. Howard, Landfill Manager, Rockford Blacktop Construction Co. to Tom Clark, Supplemental Permit Section, Illinois EPA, Springfield - 12/2/74

2 ROUTE CHARACTERISTICS

Depth to Aquifer of Concern

Name/description of aquifer(s) of concern:

11

HAWKEYE
74-162

Depth(s) from the ground surface to the highest seasonal level of the saturated zone [water table(s)] of the aquifer of concern:

Depth from the ground surface to the lowest point of waste disposal/storage:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217-782-6760

Dr. Richard H. Briceland, Director
December 2, 1974

WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop Co.
Permit No. 1972-24
Supplemental Permit No. 74-162

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental Permit is hereby granted to Rockford Blacktop Construction Co. to accept 40, 55-gallon drums of As-bearing chemical waste for one-time disposal all in accordance with the plans prepared by Rockford Blacktop Co. and Hawkeye Chemicals, dated November 5, 1974 and received by the Agency on November 7, 1974. This supplemental permit is further subject to the following special condition:

All waste shall remain containerized upon disposal at the working face of the landfill.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24, dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

Thomas P. Clark, Acting Manager
Permit Section
Division of Land Pollution Control

TPC:ds
cc's/-Region I
-Hawkeye Chemical Co.
P. O. Box 899
Clinton, Ia. 52732
-File

ROCKFORD BLACK TOP CONSTRUCTION CO.

600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-⁹⁵⁶

ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING

November 5, 1974

Tom Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

Landfill: Pagel Pit

Source: Hawkeye Chemical Company

Description: A liquid containing arsenic, PH of 11 to 14;
(see attached sheet)

Quantity: 40 - 55 gal. drums

Handling: Mix with refuse

Very truly yours,

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

HAWKEYE CHEMICAL COMPANY

October 30, 1974

ROTO-MOTOR CLEANING SERVICE
423 Twining Avenue
Davenport, Iowa 52801

ATTN: Don Hobbs

Dear Sir:

Confirming our conversation of October 30, 1974, the following is essentially the same information I relayed to you.

We have approximately 40 drums of a liquid material. Analyses of nine (9) barrels selected at random varied from 0.017% to 1.41% as arsenic content and loss on the evaporation was 64.09%.

You have agreed to provide me with a quote on removing this material from the plant and disposing of it in whatever manner.

We can confirm the exact number of drums at the time of removal.

Sincerely,

HAWKEYE CHEMICAL COMPANY

L. B. Patterson
L. B. Patterson

Vice President, Manufacturing

LBP/mj

cc/ G. Altman (Purchasing)

3 CONTAINMENT

Containment

Method(s) of waste or leachate containment evaluated:

Method with highest score:

Commercial Waste
75-34
Bar Poison Control
75-35
Automatic Close
CAUSTIC
75-36
Automatic Close
ACID
75-37

① Midwest Plating
75-80
② Midwest Plating
75-81

4 WASTE CHARACTERISTICS

Toxicity and Persistence

Compound(s) evaluated:

arsenic

Compound with highest score:

arsenic

Source: Sax. Dangerous Properties of Industrial Materials.

Hazardous Waste Quantity

Total quantity of hazardous substances at the facility, excluding those with a containment score of 0 (Give a reasonable estimate even if quantity is above maximum):

119,970 gallons or 1,983.4 drums

Sources: ① Summary sheet of Supplemental Permits granted by Illinois EPA, Division of Land Pollution Control

Basis of estimating and/or computing waste quantity:

② Lab analyses attached to letters from Charles J. Howard, Landfill Manager, Rockford Blacktop Construction Co. to Tom Clark, Supplemental Permit Section Illinois EPA, Springfield, IL dated Feb 17, 1975, March 4, 1975, May 3, 1975 and July 19, 1974.
Letter from Paul Beardsley, Gale Products, Galesburg, IL to J.F. Kullberg, President, Interstate Pollution Control, Inc., Rockford on 12/3/74.

~~Garrett Locks~~
75-33

Gale Products
75-33

National Lock
Pillbox House Scrub
74-72

National Lock
74-107

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 10

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217/782/6760

Dr. Richard H. Briceland, Director

February 25, 1975

IN REPLY REFER TO: 20180801
WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 75-34

Rockford Blacktop Construction Company
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental Permit is hereby granted to Rockford Blacktop Construction Company to accept 18 fifty-five gallon drums of metal hydroxide sludge generated by Commercial Wire all in accordance with the plans prepared by Charles J. Howard, landfill manager, Rockford Blacktop, dated January 20, 1975 and received by the Agency on January 21, 1975. This supplemental permit is further subject to the following special conditions:

Waste shall be disposed of in accordance with
Supplemental Permit No. 74-130.

This permit shall expire one year from the date of
issuance, subject to renewal upon prior approval
of the Agency.

Except as modified in the above documents, the site shall
be operated in accordance with the terms and conditions of Permit
No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

C. E. Clark
C. E. Clark, Manager
Permit Section
Division of Land Pollution Control

TEC:ch
cc Region I
File

ROCKFORD BLACK TOP CONSTRUCTION CO.

600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-956

ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING

January 20, 1975

Tom Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

Landfill: Pagel Pit, 20180801

Source: Commercial Wire

Description: See next page. This material is from the same
process. Supplemental permit no. 74-130 was issued for this.

Quantity: 18 - 55 gal. drums

Handling: Placed with household refuse

Very truly yours,

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

H-18/100

Test Number 5-112
MET-Chem Consultants, Inc.
802 Cedar Street
Rockford, Illinois 61102
815-964-8518

From Commercial Hirc 12
1537 Broadway
61101
Sample Carbonate Sludge
Mr. Howard Ellis

Sample Received 1-9-75

Sample Tested 1-13-75

Acidity _____

Lead _____

Molybdenum _____

Nickel _____

Alkalinity _____

Nitrogen _____

Aluminum _____

Oil & Grease _____

BOD₅ _____

Boron _____

Phosphorus _____

Cadmium _____

Carbon _____

Chlorine _____

Carbonates = 2.6 %

Salt Spray Res. _____

Silicon _____

Chrome _____

Silver _____

Solids _____

COD _____

Specific Gravity _____

Coliforms _____

Sulfur _____

Copper _____

Surface Tension _____

Cyanide _____

Total .15 %

Free _____

Viscosity _____

Zinc .042 %

DO _____

Other _____

Flash Point _____

Fire Point _____

Humidity _____

Resistance _____

Iron _____

Results submitted by:

[Signature]

ROCKFORD BLACK TOP CONSTRUCTION CO.

600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-9561

ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING

February 9, 1976

Commercial Wire
1827 Broadway
Rockford, Illinois 61106

Dear Harold:

Enclosed is a copy of permit No. 75-34, and also some blank forms for your use. If I can be of any assistance, don't hesitate to ask.

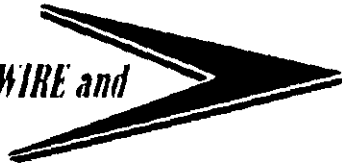
Good Luck,

CH/1h

CHUCK HOWARD

14/

COMMERCIAL WIRE and



DISPLAY PRODUCTS CORP.

1827 BROADWAY • ROCKFORD, ILLINOIS 61106
Area Code 815/397-3880

January 17, 1975

Rockford Black Top Construction Co.
600 Boylston
Rockford, IL 61111

Attention: Mr. Chuck Howard

Dear Chuck:

This is the lab analysis on the carbonates. There will be approximately 18 55-gal. drums.

Please advise on receipt of permit from E.P.S. for us to put it into land fill.

Thanks,

Harold E. Ellis

Harold E. Ellis

HEE/mnj
encl.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 15

2200 Churchill Road
62706

Springfield, Illinois
Phone: 217/782/6760



Dr. Richard H. Briceland, Director

February 25, 1975

IN REPLY REFER TO: 20180801
WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 75-35

*PARSON
CASSETS*

Rockford Blacktop Construction Company
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental Permit is hereby granted to Rockford Blacktop to accept 20,000 gallons per year of metal sludge, generated by Belvidere Hardware, Belvidere, Illinois, all in accordance with the plans prepared by Charles J. Howard, Rockford Blacktop, dated February 7, 1975 and received by the Agency on February 13, 1975. This supplemental permit is further subject to the following special conditions:

Waste shall be disposed of at the working face of the landfill in a ratio not to exceed 10 gallons per cubic yard of solid waste.

This permit shall expire one year from the date of issuance, subject to renewal upon prior approval of the Agency.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

C. E. Clark
C. E. Clark, Manager
Permit Section
Division of Land Pollution Control

TEC:ch
cc Region 1
File

ROCKFORD BLACK TOP CONSTRUCTION CO.600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-~~1111~~ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING

Mr. Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

~~FEB~~ ~~1975~~
FEB 7, 1975

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

Landfill: Pagels
Source: Belvidere Hardware
Description: See Attached Sheet

Quantity: 20,000 Gal./yr.
Handling: Mix with refuse

Very truly yours,

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

\$251.00

Test Number D-100

MET-Chem Consultants, Inc.
302 Cedar Street
Rockford, Illinois
815-964-8518

Client Industrial Pollution 17

Sludge (Ground)
Date 1-30-75 Location Rockford

Sample Received 1-30-75

Tested 1-31-75

Acidity _____

Alkalinity _____

Aluminum _____

Oil & Grease _____

BOD₅ _____

Boron _____

Phosphorus _____

Cadmium _____

Carbon _____

Chlorine _____

Salt Spray Res. _____

Silicon _____

Chrome 10.0 ppm

Silver _____

Solids Total = 40.7 g/L

Specific Gravity _____

Sulfur _____

Surface Tension _____

COD _____

Coliform _____

Copper 4.0 g/L

Cyanide _____

Total 124.8 ppm

Free _____

Viscosity _____

Zinc 370.0 ppm

Other _____

DO _____

Flash Point None

Fire Point _____

Humidity _____

Resistance _____

Iron _____

pH = 8.9

Results submitted by:

G. Nausner

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 18

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217/782/6760

Dr. Richard H. Briceland, Director

February 25, 1975

IN REPLY REFER TO: 20180801
WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 75-36

Rockford Blacktop Construction Company
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental Permit is hereby granted to Rockford Blacktop Construction Company to accept 16,000 gallons per year of Caustic Sludge, generated by Automatic Electric, Rockford, Illinois all in accordance with the plans prepared by Rockford Blacktop, dated February 10, 1975 and received by the Agency on February 13, 1975. This supplemental permit is further subject to the following special conditions:

Waste shall be disposed of at the working face of the landfill at a rate not to exceed 10 gal./yd³ of solid wastes.

This permit shall expire one year from the date of issuance, subject to renewal upon prior approval of the Agency.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

C. E. Clark
C. E. Clark, Manager
Permit Section
Division of Land Pollution Control

TEC:ch
cc Region I
File

ROCKFORD BLACK TOP CONSTRUCTION CO.

600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-954

ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING

February 10, 1975

Mr. Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

Landfill: Pagels 1972-24

Source: Automatic Electric

Description: Caustic Sludge - see attached sheet

Quantity: 16,000 Gal. per year

Handling: Mix with household refuse

Very truly yours,

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

20/11/75

Test Number 5-163
 WBF-Chem Consultants, Inc.
 802 Cedar Street
 Rockford, Illinois 61102
 815-964-8518

From: Interstate Pollution
1525-9th St.
Automatic Electric
 Sample I.D. caustic
 Sample Date _____

TEST RESULTS

Sample Received 2-7-75Sample Tested 2-7-75

Acidity _____

Lead _____

Molybdenum _____

Nickel _____

Alkalinity _____

Nitrogen _____

Aluminum _____

Oil & Grease _____

BOD₅ _____

Boron _____

Phosphorus _____

Cadmium _____

Carbon _____

Chlorine _____

Salt Spray Res. _____

Silicon _____

Chrome 49.0 ppm

Silver _____

Solids Total = 115.4 g/l

COD _____

Specific Gravity _____

Coliforms _____

Sulfur _____

Copper 24.0 ppm

Surface Tension _____

Cyanide _____

Total _____

Free _____

Viscosity _____

DO _____

Zinc 423.0 ppm

Other _____

Flash Point nonepH = 13.1

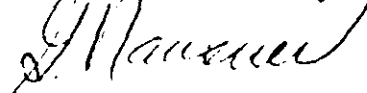
Fire Point _____

Humidity _____

Resistance _____

Iron _____

Results submitted by:



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

21

2200 Churchill Road

62706



Springfield, Illinois

Phone: 217/782/6760

Dr. Richard H. Briceland, Director

February 25, 1975

IN REPLY REFER TO: 20180801
WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 75-37

Rockford Blacktop Construction Company
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental Permit is hereby granted to Rockford Blacktop Construction Company to accept 18,000 gallons per year of acid sludge generated by Automatic Electric, Rockford, Illinois all in accordance with the plans prepared by Charles J. Howard, Landfill Manager, Rockford Blacktop, dated February 10, 1975 and received by the Agency on February 14, 1975. This supplemental permit is further subject to the following special conditions:

This permit will expire one year from the date of issuance, subject to renewal, upon prior approval of the Agency.

Due to the low pH of this material, it is recommended that employees charged with its disposal take precautionary measures and wear protective clothing so as to prevent contact with it during disposal operations. Waste should be spread over the solid waste as thinly as possible and then be promptly covered with additional refuse and earth cover.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

C. E. Clark

C. E. Clark, Manager

Permit Section

Division of Land Pollution Control

TEC:ch
cc Region I
File

100% recycled paper

ROCKFORD BLACK TOP CONSTRUCTION CO.600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-**958**ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING

February 10, 1975

Mr. Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

Landfill: Pagels 1972-24

Source: Automatic Electric

Description: Acid Sludge - see attached sheet

Quantity: 18,000 Gal. per year

Handling: Mix with household refuse

Very truly yours,

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

20/92

Test Number 5-162
MLT-Chem Consultants, Inc.
802 Cedar Street
Rockford, Illinois 61102
815-964-8518

From: Interstate Pollution ²³
1525-9th St.
Automatic Electric
Sample I.D. acid
Sample Date 2-7-75

TEST RESULTS

Sample Received 2-7-75

Sample Tested 2-7-75

Acidity _____

Lead _____

Molybdenum _____

Nickel _____

Alkalinity _____

Nitrogen _____

Aluminum _____

Oil & Grease _____

BOD₅ _____

Boron _____

Phosphorus _____

Cadmium _____

Carbon _____

Chlorine _____

Salt Spray Res. _____

Silicon _____

Chrome 578 ppm

Silver _____

Solids Total = 44.3 g/l

COD _____

Specific Gravity _____

Coliforms _____

Sulfur _____

Copper 416 ppm

Surface Tension _____

Cyanide _____

Total _____

Free _____

Viscosity _____

Zinc 588 ppm

DO _____

Other _____

Flash Point none

pH = 0.3

Fire Point _____

Humidity _____

Resistance _____

Iron _____

Results submitted by:

J. Mauer

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 24

2200 Churchill Road
62708



Springfield, Illinois
Phone: 217-782-6760

Dr. Richard H. Briceland, Director
March 13, 1975

IN REPLY REFER TO: 20103008
WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 75-80

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental permit is hereby granted to Rockford Blacktop Construction Co. to accept one time only, 16,000 gallons of plating waste, generated by Midwest Plating, Rockford, Illinois all in accordance with the plans prepared by Charles J. Howard, Rockford Blacktop, dated March 4, 1975 and received by the Agency on March 5, 1975. This supplemental permit is further subject to the following special condition:

This liquid waste shall be mixed with incoming solid waste at the landfill working face at a rate not to exceed 10 gal./yd³.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.


Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

C. E. Clark, Manager
Permit Section
Division of Land Pollution Control

TEC:ds
cc's/-Region N
-File

ROCKFORD BLACK TOP CONSTRUCTION CO.

600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-

ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING

March 4, 1975

Mr. Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2201 Churchill Road
Springfield, Illinois 62706

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

Landfill:	Pagels
Source:	Midwest Plating
Description:	Plating waste
Quantity:	16,000 Gallons
Handling:	Mix with refuse

Very truly yours,

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

Lab. Number 5-216
MFI-Chem Consultants, Inc.
802 Cedar Street
Rockford, Illinois 61102
815-964-8518

From Interstate Pollution ²⁶
Midwest Plating
1525-9th St 61108
Sample I.D. Liquid
Sample Date 2-27-75

TEST RESULTS

Sample Received 2-27-75

Sample Tested 2-27-75

Acidity _____

Lead _____

Molybdenum _____

Nickel _____

Alkalinity _____

Nitrogen _____

Aluminum _____

Oil & Grease _____

BOD₅ _____

Boron _____

Phosphorus _____

Cadmium _____

Carbon _____

Chlorine _____

Salt Spray Res. _____

Silicon _____

Chrome 31 ppm

Silver _____

Solids Total = 13.9%

COD _____

Specific Gravity _____

Coliforms _____

Sulfur _____

Copper 650 ppm

Surface Tension _____

Cyanide _____

Total _____

Free _____

Viscosity _____

DO _____

Zinc 249 ppm

Other _____

Flash Point none

pH = 1.6

Fire Point _____

Humidity _____

Resistance _____

Iron _____

Results submitted by:

S. N. N. N. N.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 27

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217-782-6760

Dr. Richard H. Briceland, Director
March 13, 1975

IN REPLY REFER TO: 20103008
WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 75-81

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

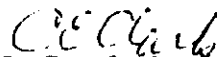
Supplemental permit is hereby granted to Rockford Blacktop Construction Co. to accept one time only, 4000 gallons of plating waste, generated by Midwest Plating, Rockford, Illinois all in accordance with the plans prepared by Rockford Blacktop, dated March 4, 1975 and received by the Agency on March 5, 1975. This supplemental permit is further subject to the following special condition:

This liquid waste shall be mixed with incoming solid waste at the landfill working face at a rate not to exceed 10 gal/yd³.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY


C. E. Clark, Manager
Permit Section
Division of Land Pollution Control

TEC:ds
cc's/-Region N
-File

ROCKFORD BLACK TOP CONSTRUCTION CO.600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-**9871****ALL TYPES OF ASPHALT PAVING
GRADING CONTRACTORS
STONE & GRAVEL PRODUCERS
PREMIXED PATCHING**

March 4, 1975

Mr. Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

Landfill:	Pagels
Source:	Midwest Plating
Description:	Plating waste
Quantity:	4,000 gallons
Handling:	Mix with refuse

Very truly yours,

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

Test Number 5-215
MET-Chem Consultants, Inc.
802 Cedar Street
Rockford, Illinois 61102
815-964-8518

From: Interstate Pollution²⁹
Midwest Plating
Sample I.D. Sludge
Sample Date 2-27

TEST RESULTS

Sample Received 2-27-75

Sample Tested 2-27-75

Acidity _____

Lead _____

Molybdenum _____

Nickel _____

Alkalinity _____

Nitrogen _____

Aluminum _____

Oil & Grease _____

BOD₅ _____

Boron _____

Phosphorus _____

Cadmium _____

Carbon _____

Chlorine _____

Salt Spray Res. _____

Silicon _____

Chrome 4000 ppm

Silver _____

Solids Total = 18.0 %

COD _____

Specific Gravity _____

Coliforms _____

Sulfur _____

Copper 220 ppm

Surface Tension _____

Cyanide _____

Total _____

Free _____

Viscosity _____

Zinc 1140 ppm

DO _____

Other _____

Flash Point none

pH = 8.3

Fire Point _____

Humidity _____

Resistance _____

Iron _____

Results submitted by:

[Signature]

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

30

2200 Churchill Road

62706



Springfield, Illinois

Phone: 217-525-3334

Dr. Richard H. Briceland, Director

May 20, 1974

WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop Co.
Permit No. 1972-24
Supplemental Permit No. 74-72

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental Permit is hereby granted to Rockford Blacktop Construction Co. to accept up to 1000 gallons per month in approximately 20 open-top drums of waste sludge generated by National Lock, Rockford, Illinois all in accordance with the plans prepared by Charles J. Howard, Landfill Manager, dated May 3, 1974 and received by the Agency on May 6, 1974. This supplemental permit is further subject to the following special condition:

Waste is to be buried in barrels which will be deposited at the working face of the landfill with the general refuse and covered promptly.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script that reads "Thomas P. Clark".

Thomas P. Clark, Acting Manager
Permit Section
Division of Land Pollution Control

TPC:ds
cc's/-Region I
-File

PICKLE HOUSE
SLUDGE

May 3, 1974

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Attn: Supplemental Permit Section

re: 20180801 - Page 1 Pit

Gentlemen:

I am requesting permission to dispose of approximately
1,000 Gal. per month of a waste generated by National Lock. This

liquid contains:

- 33.52% Dry
- 2.6% Sodium
- 1.4% Calcium
- 3.6% Zinc
- 18.1% Iron
- 2.0% Phosphate

This liquid would be delivered to me in open top barrels,
and I would mix it with household refuse with no special handling.

Very truly yours,

CJH/lh

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

PICKUP House
SCUDGE

N.L.

5/10/74
PICKUP

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217-782-3334

32

Dr. Richard H. Briceland, Director
September 5, 1974

WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 74-126

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental permit is hereby granted to Rockford Blacktop Construction Co. to accept a limited amount of spent acid waste generated by National Lock Co., Rockford and to be handled as hereafter detailed, all in accordance with the plans prepared by Charles J. Howard, Rockford Blacktop Co. and National Lock Co. of Rockford, dated August 15, 1974 and received by the Agency on August 16, 1974. This supplemental permit is further subject to the following special conditions:

1. This supplemental permit shall supercede the authority granted under Supplemental Permits 74-76 and 74-107.
2. This supplemental permit shall allow disposal of up to 25,000 gallons of spent acid over the next year. A maximum of 5000 gallons shall be disposed of in any month. Should the 25,000-gallon limit on this material not be reached within the year, this permit may be renewed only upon re-application to the Agency. Additionally, the Agency shall be notified in writing should the 25,000-gallon limit be reached before this limit.
3. Due to the low pH of this material, it is recommended that employees charged with its disposal wear protective clothing so as to prevent contact with it during disposal operations. Waste should be spread over the solid waste as thinly as possible and then be promptly covered with additional refuse and earth cover.

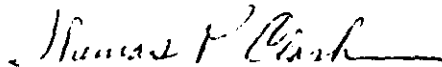
SPENT ACID
N.L.

Rockford Blacktop Construction Co.
Page (2)
September 5, 1974

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY



Thomas P. Clark, Acting Manager
Permit Section
Division of Land Pollution Control

TPC:ds
cc's/-Region I
-National Lock Co.
Rockford, Ill. 61101
-File

34

May 20, 1974

Tom Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

re: Winnebago County
Pagel Pit 20180801

Dear Mr. Clark:

I am requesting permission to dispose of 5,000 gallon of
a liquid from National Leach containing:

55 PPM Chrome
52 PPM Copper
610 PPM Iron
558 PPM Nickel
280 PPM Zinc
49.9 PPM Hexachrome

This liquid would be put in my storage tank with the leachate
and would be pumped onto the fill on a warm, dry day using our
sprinkler system.

Very truly yours,

cc to Roto Rooter
CJH/lh

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Const. Co.

25,000 GAL
OR
LESS

SPENT
ACID

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 35

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217-525-3334

Dr. Richard H. Briceland, Director
May 24, 1974

WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 74-76

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental Permit is hereby granted to Rockford Blacktop Construction Company to accept for one-time disposal, 5000 gallons of liquid waste generated by National Lock Company, Rockford, Illinois all in accordance with the plans prepared by Charles J. Howard, Landfill Manager, dated May 20, 1974 and received by the Agency on May 22, 1974. This supplemental permit is further subject to the following special condition:

Liquid waste shall be handled only in the manner specified in the application request. Upon discharge from the leachate distribution sprinkler, the liquid waste and refuse shall be covered promptly with approved and suitable cover in compliance with Rule 305(a), to prevent odors and other nuisances.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

Thomas P. Clark, Acting Manager
Permit Section
Division of Land Pollution Control

TPC:ds
cc's/-Region I
-File

July 19, 1974

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

re: Winnebago County
Land Pollution Control
1972-24 Page 1

Attn: Mr. Tom Clark
Supplemental Permit

Dear Mr. Clark:

I am requesting permission for the deposit of 5000 gallons of a liquid from National Lock Company described in the attached letter.

This is a one time operation. The liquid would be placed with the household refuse.

Very truly yours,

CJR/lh

CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.

Karl Dahlen



37
NATIONAL LOCK DIVISION

KEYSTONE CONSOLIDATED INDUSTRIES, INC.
ROCKFORD, ILLINOIS 61101

JECT

DATE

Speed Letter

Metals in rubber lined tank

7/12/74

On July 10, 1974, I received a sample from the rubber lined tank in a pit at the Northwest side of the fastener plant. We analyzed this solution and determined it contained the following metals.

METALS	ppm
COPPER ✓	14.6 ppm
NICKEL ✓	30.6 ppm
ZINC ✓	41.5 ppm
IRON ✓	860.0 ppm
TOTAL CHROME ✓	530.0 ppm
LEAD	1.2 ppm

It also contained 4.0 ppm of cyanide, and had a pH of 0.6 which means it is highly acidic. The cyanide that is present comes from the iron cyanide which does not destroy in an acidic solution. If there are any questions, call me at 325.

Ken Witt

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

38

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217-782-3334

Dr. Richard H. Briceland, Director
July 26, 1974

WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 74-107

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental permit is hereby granted to Rockford Blacktop Construction Company to accept for one-time disposal, 5,000 gallons of acidic waste from National Lock Company, Rockford all in accordance with the plans prepared by Rockford Blacktop Construction Co. and National Lock Company, dated July 19, 1974 and received by the Agency on July 23, 1974. This supplemental permit is further subject to the following special condition:

Due to the very low pH of this material, care shall be taken to assure that no human contact is permitted with it during the disposal operation. It is recommended that the waste be spread over the solid waste as thinly as possible and then promptly covered with additional refuse and earth cover.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, reading "Thomas P. Clark".

Thomas P. Clark, Acting Manager
Permit Section
Division of Land Pollution Control

TPC:ds
cc's/-Region I
-File

Karl Dahlen



NATIONAL LOCK DIVISION

KEYSTONE CONSOLIDATED INDUSTRIES, INC.

ROCKFORD, ILLINOIS 61101 39

ECT

DATE

Underground acid tank at NW corner

8/5/74

Speed Letter

On July 30, we received a sample from the underground acid tank on the Northwest corner of the fastener plant. I ran an analysis and determined that this sample was 25% muriatic and had a pH of 1.4. It also contained the following metals.

chromium	ppm
copper	14.57
nickel	30.60
zinc	41.50
iron	860.0
total chrome	53.0
cyanide	2.2

Ken Witt

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY 40

2200 Churchill Road
62706



Springfield, Illinois
Phone: 217-782-6760

Dr. Richard H. Briceland, Director
February 24, 1975

IN REPLY REFER TO: 20180801
WINNEBAGO COUNTY - Land Pollution Control
New Milford/Rockford Blacktop
Permit No. 1972-24
Supplemental Permit No. 75-33

Rockford Blacktop Construction Co.
600 Boylston Street
Loves Park, Illinois 61111

Gentlemen:

Supplemental permit is hereby granted to Rockford Blacktop to accept a 1592-gallon backlog and 1040 gallons per week of industrial sludges, generated by Gale Products, Galesburg, Illinois all in accordance with the plans prepared by Rockford Blacktop, dated December 10, 1974 and received by the Agency on February 7, 1975. This supplemental permit is further subject to the following special conditions:

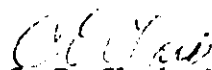
The backlog material as well as the routinely generated material shall be disposed at the working face in a ratio that does not exceed 10 gallons per cubic yard of solid waste.

This permit shall expire one year from the date of issuance, subject to renewal upon prior approval of the Agency.

Except as modified in the above documents, the site shall be operated in accordance with the terms and conditions of Permit No. 1972-24 dated April 7, 1972.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY


C. E. Clark, Manager
Permit Section
Division of Land Pollution Control

TEC:ds
cc's/-Region 1
-File

ROCKFORD BLACK TOP CONSTRUCTION CO.

600 BOYLSTON STREET • LOVES PARK, ILL. 61111 • Phone 877-956

ALL TYPES OF ASPHALT PAVING

GRADING CONTRACTS

STONE BASES & PROTECTOR

PAVING MIXTURES

December 10, 1974

Tom Clark
Supplemental Permit Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Winnebago County
Land Pollution Control

Dear Mr. Clark:

I am requesting permission to dispose of the following material:

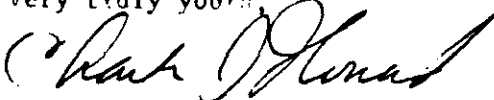
Landfill: Pagels; 1972-24; 20180801

Source: Gale Products

Description: See next two pages

Quantity: See Red ink on next page; total of 398-55 open top drums
containing approximately 40 gal. each are on hand as a backlog.
Handling: Approximately 26 drums are generated per week.
Dump with household refuse.

Very truly yours,



CHARLES J. HOWARD, Landfill Manager
Rockford Blacktop Construction Co.



GALE PRODUCTS

A DIVISION OF OUTBOARD MARINE CORPORATION - GALESBURG, ILL. 61031

TEL. (309) 343-0141

December 3, 1974

Mr. J. C. Kullberg, President
Interstate Pollution Control, Inc.
1525 - 9th Street
Rockford, Illinois 61108

Dear Mr. Kullberg:

The following is a description of the sludge which we remove from our effluent treatment systems. As we discussed during your recent visit, there are three such units each having a different composition of sludge. Therefore, an analysis is given for each process.

Acid-Alkali Neutralization

Solids	35-40%
Composition	
Calcium Sulfate	1.6%
Calcium Hydroxide	98.3%
Iron Hydroxide	1.3%
Nickel Hydroxide	.4%
pH	7.5-8.5

1200 GAL BACKLOG

80 GAL/WK

Cyanide Destruction Unit

Solids	35-40%
Composition	
Calcium Hydroxide CARBONATE	99+%
(Water Hardness)	
Cadmium Hydroxide	Trace
pH	9.5-10.5

6160 GAL BACKLOG

400 GAL/WK

Chromium Precipitation Unit

Solids	35-40%
Composition	
Barium Chromate	97.6%
Chromium (Tri valent)	1.4%
Barium Carbonate	1.0%
pH	6.5-7.5

6160 GAL BACKLOG

400 GAL/WK

Mr. J. C. Kullberg
December 3, 1974
Page 2

43

Paint Booth Waste (Water Type)

Solids	80%
Composition	
Alkyd Resin Solids	96%
Pigments	4%
pH	9.0-9.5

2400 GAL BACKLOG

160 GAL/WK

If there are any questions concerning the above or additional information is required, we will try to supply it.

Sincerely,

GALE PRODUCTS

G. Paul Beardsley

G. Paul Beardsley
Chemical Engineer

GPB:gt

cc: W. Boles
M. Kirkenmeier
D. McGrew



GALE PRODUCTS

44

A DIVISION OF OUTBOARD MARINE CORPORATION - GALESBURG, ILL. 61401

TEL. (309) 343-0141

December 3, 1974

Mr. J. C. Kullberg, President
Interstate Pollution Control, Inc.
1525 - 9th Street
Rockford, Illinois 61108

Dear Mr. Kullberg:

The following is a description of the sludge which we remove from our effluent treatment systems. As we discussed during your recent visit, there are three such units each having a different composition of sludge. Therefore, an analysis is given for each process.

Acid-Alkali Neutralization

Solids	35-40%
Composition	
Calcium Sulfate	1.6%
Calcium Hydroxide	98.3%
Iron Hydroxide	1.3%
Nickel Hydroxide	.4%
pH	7.5-8.5

30 BAR
x 40
1200

EST 2 ~~1~~/WK
x 40
80

Cyanide Destruction Unit

Solids	35-40%
Composition	
Calcium Hydroxide (Water Hardness)	99+%
Cadmium Hydroxide	Trace
pH	9.5-10.5

154 BAR
6,160

EST 10/WK
400

Chromium Precipitation Unit

Solids	35-40%
Composition	
Barium Chromate	97.6%
Chromium (Tri valent)	1.4%
Barium Carbonate	1.0%
pH	6.5-7.5

154 BAR
6,160

10/WK
400

December 5, 1974

Page 2

Paint Booth Waste (Water Type)

Solids	80%
Composition	
Alkyd Resin Solids	96%
Pigments	4%
pH	9.0-9.5

60 bar - 2400
4/WK - 160

If there are any questions concerning the above or additional information is required, we will try to supply it.

Sincerely,

GALE PRODUCTS

G. Paul Beardsley
G. Paul Beardsley
Chemical Engineer

GPB:gt

cc: W. Boles
M. Kirkenmeier
D. McGrew

400 BAR 2-3 months
12 PCR/WK
98
open top Barrels

40 GAL EACH

398

SECTION II

)

)

ROTO-ROOTER

Sewer Cleaning Service

A NATIONAL SERVICE - AVAILABLE LOCALLY

422 PERSHING AVE.

DAVENPORT, IOWA 52801

DAV. 323-4544
R. I. 788-0935

June 5, 1984

Winnebago Reclamation Service, Inc.
P.O. Box 2071
Loves Park, Ill. 61130

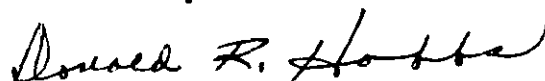
Dear Chuck

In response to your letter concerning chemical waste hauled from Hawkeye Chemical Company.

We have looked through our files very thoroughly and have been unable to find any record of a quote on removing this material. We also looked through our files for a bill and we do not have any record of ever working for Hawkeye Chemical Company.

Sorry!

Yours truly



Don Hobbs
Roto-Rooter Sewer Cleaning Service



SECTION III



)

)



Engineers & Scientists • Environmental • Geological • Civil • Structural • Geotechnical • Chemical/Materials Testing • Soil Borings • Surveying

1408 EMBL STREET, P.O. BOX 9636, MADISON, WIS. 53716 • TEL. (608) 257-4848 WIS. TOLL FREE NO. 800-363-6006

July 12, 1984
C 11607

Mr. Charles Howard, President
Rockford Blacktop Construction Co., Inc.
600 Boylston Street
Loves Park, IL 61111

Re: Pagel Pit Landfill

Dear Mr. Howard:

Puruant to your request, we have performed an independent evaluation of the Pagel Pit Landfill using the EPA hazardous ranking system (HRS system). The completed ranking forms are attached. The site had been originally ranked in December of 1983, which resulted in a ranking of 40.70. Based on our previous conversations, apparently some inaccurate data was used to evaluate the site. Based on the information provided by you, which included the past EPA ranking sheets, preliminary site work sheets and potential hazardous waste site inspection report, we have completed our evaluation. The following is our comments on the previous evaluation and the reasoning behind our current evaluation.

Groundwater Route Work Sheets

We concur with the original ranking of the site with regard to "observed release". The guidelines for preparing the work sheet, as appeared in the Federal Register of July, 1982 states that "Direct evidence of release must be analytical. If a contaminant is measured (regardless of frequency) in groundwater or in well in the vicinity of the facility at a significantly (in terms of demonstrating that a release has occurred, not in terms of potential effects) higher level than background level, then quantitative evidence exists and release has been observed." As arsenic has been noted at elevations above background level at a well in the vicinity of your site, by strict definition, then a release has occurred. The ranking has no factor to relate the site in question as the source. This is a major weakness of the HRS.

Based on information provided, we disagree with the evaluation of "waste characteristics" as contained in the original ranking. Though a permit was issued by the State of Illinois for your acceptance of arsenic waste, you have indicated that these wastes were never accepted at the site. Therefore,

to evaluate waste characteristics, we researched the information provided on special wastes accepted to the site. The only documented hazardous materials which were accepted in the site were a phenol waste from the ACME Resins Co. The permit, #75-239, indicated that phenols in water base could be accepted at the site. Your records indicate that 60.81 tons of material was accepted. Using phenols as the only documented hazardous materials accepted at the site, the waste characteristics ranking for phenols is significantly lower than for the arsenic waste.

With respect to No. 5-Targets on the groundwater route work sheet, we relied primarily on the field inspection information contained in the EPA site inspection report as we have not performed a site inspection. Therefore, we agree with the original ranking in this regard.

Surface Water Route Work Sheet

We generally concur with the initial site ranking with regard to surface water route work sheet. The one exception is regarding to Group No. 2, the value for the 1 year 24-hour rainfall. The original ranking gave an assigned value of 1 whereas the correct value would be 2. Though this changes the ranking for the Group 2 Surface Water Route characteristic slightly, the overall score for the surface water route work sheet is the same.

Air Route Work Sheet

As there has been no observed release with respect to air quality at the site, the final score for the air route work sheet is 0.

The original ranking provided a ranking of 40.7. Our revised ranking indicates a score of 24.77. This is primarily due to the groundwater route work sheet on waste characteristics which the original work sheet used inaccurate assumptions regarding actual waste acceptance.

We trust that the information contained herein is sufficient for your present needs. If you have any questions or comments, please contact us at your convenience.

Very truly yours,

WARZYN ENGINEERING INC.

Douglas A. Wierman

Douglas A. Wierman
Senior Hydrogeologist

DAW/las
[las-1-43]

Encl: HRS Ranking Sheets



Facility name:	<u>Page1 Pit</u>		
Location:	<u>Rockford, IL</u>		
EPA Region:	<u>5</u>		
Person(s) in charge of the facility:	<u>Robert Anderson</u>		
	<u>Winnebago Reclamation Service, Inc.</u>		
Name of Reviewer:	<u>Douglas A. Wierman</u>	Date:	<u>7-12-84</u>
General description of the facility:			
(For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)			
<u>Site is a solid waste landfill, originally permitted by the</u>			
<u>State of Illinois in 1972. It was formerly a sand and</u>			
<u>gravel pit which has been lined with an asphalt liner and</u>			
<u>leachate collection system. The site is immediately down-</u>			
<u>gradient from a documented, contaminating disposal site,</u>			
<u>Acme Solvents.</u>			
Scores: $S_M = 24.77$ $(S_{gw} = 42.86$ $S_{sw} = 0$ $S_a = 0)$			
$S_{FE} = 0$			
$S_{DC} = 0$			

HRS COVER SHEET

Surface Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi-plier	Score	Max. Score	Ref. (Section)	
1 Observed Release	0 45	1	0	45	4.1	
If observed release is given a value of 45, proceed to line 4 . If observed release is given a value of 0, proceed to line 2 .						
2 Route Characteristics					4.2	
Facility Slope and Intervening Terrain	0 1 2 3	1	3	3		
1-yr. 24-hr. Rainfall	0 1 2 3	1	2	3		
Distance to Nearest Surface Water	0 1 2 3	2	6	6		
Physical State	0 1 2 3	1	3	3		
Total Route Characteristics Score			14	15		
3 Containment	0 1 2 3	1	0	3	4.3	
4 Waste Characteristics					4.4	
Toxicity/Persistence	0 3 6 9 12 15 18	1		18		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8		
Total Waste Characteristics Score			N/A	26		
5 Targets					4.5	
Surface Water Use	0 1 2 3	3		9		
Distance to a Sensitive Environment	0 1 2 3	2		6		
Population Served/Distance to Water Intake Downstream	0 4 6 8 10 12 16 18 20 24 30 32 35 40	1		40		
Total Targets Score			N/A	55		
6 If line 1 is 45, multiply 1 x 4 x 5 If line 1 is 0, multiply 2 x 3 x 4 x 5			0	64,350		
7 Divide line 6 by 64,350 and multiply by 100			S _{SW} = 0			

SURFACE WATER ROUTE WORK SHEET

Air Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi- plier	Score	Max. Score	Ref. (Section)	
1 Observed Release	0 45	1	0	45	5.1	
Date and Location:						
Sampling Protocol:						
If line 1 is 0, the $S_a = 0$. Enter on line 5 . If line 1 is 45, then proceed to line 2 .						
2 Waste Characteristics					5.2	
Reactivity and Incompatibility	0 1 2 3	1		3		
Toxicity	0 1 2 3	3		9		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8		
Total Waste Characteristics Score				20		
3 Targets					5.3	
Population Within 4-Mile Radius	0 9 12 15 18 21 24 27 30	1		30		
Distance to Sensitive Environment	0 1 2 3	2		6		
Land Use	0 1 2 3	1		3		
Total Targets Score				39		
4 Multiply 1 x 2 x 3				35,100		
5 Divide line 4 by 35,100 and multiply by 100			$S_a = 0$			

AIR ROUTE WORK SHEET

Ground Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi-plier	Score	Max. Score	Ref. (Section)	
1 Observed Release	0 <u>45</u>	1	45	45	3.1	
If observed release is given a score of 45, proceed to line 4 . If observed release is given a score of 0, proceed to line 2 .						
2 Route Characteristics					3.2	
Depth to Aquifer of Concern	0 1 2 3	2		6		
Net Precipitation	0 1 2 3	1		3		
Permeability of the Unsaturated Zone	0 1 2 3	1		3		
Physical State	0 1 2 3	1		3		
Total Route Characteristics Score				15		
3 Containment	0 1 2 3	1		3	3.3	
4 Waste Characteristics					3.4	
Toxicity/Persistence	0 3 8 9 <u>12</u> 15 18	1	12	18		
Hazardous Waste Quantity	0 1 <u>2</u> 3 4 5 6 7 8	1	2	8		
Total Waste Characteristics Score			14	26		
5 Targets					3.5	
Ground Water Use	0 1 2 <u>3</u>	3	9	9		
Distance to Nearest Well/Population Served	0 4 6 8 10 12 16 18 20 24 <u>30</u> 32 35 40	1	30	40		
Total Targets Score			39	49		
6 If line 1 is 45, multiply 1 x 4 x 5 If line 1 is 0, multiply 2 x 3 x 4 x 5		24	570	57,330		
7 Divide line 6 by 57,330 and multiply by 100		S _{gw} =		42.86		

GROUND WATER ROUTE WORK SHEET

	s	s ²
Groundwater Route Score (S _{gw})	42.86	1836.98
Surface Water Route Score (S _{sw})	-	-
Air Route Score (S _a)	-	-
$S_{gw}^2 + S_{sw}^2 + S_a^2$		1836.98
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2}$		42.86
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2} / 1.73 = S_M =$		24.77

WORKSHEET FOR COMPUTING S_M

ADDENDUM

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SEE REFERENCE SHEET

DATE OF DOCUMENT: 8-30-84

SITE NAME: PAGEL'S PIT

DESCRIPTION: Letter to Mr. Richard E. Bortelt

DOCUMENT GENERATED BY: Winnebago Reclamation Service, Inc.

ALPHABETICAL SUBSECTION: TS.1

LOCATION OF DOCUMENT:

- ☒ FILE FOLDER
- ☐ ACCORDION FOLDER
- ☐ PRP SPECIFIC FILES
- ☐ OFFICE OF REGIONAL COUNSEL
- ☐ OTHER: _____

SENSITIVITY:

- ☐ CONFIDENTIAL BUSINESS INFORMATION
- ☐ ENFORCEMENT CONFIDENTIAL

SEE REFERENCE SHEET

DATE OF DOCUMENT: 8-27-84

SITE NAME: PAGEL'S PIT

DESCRIPTION: Letter to Rockford Blacktop

DOCUMENT GENERATED BY: Hawkeye Chemical Company

ALPHABETICAL SUBSECTION: TS.1

LOCATION OF DOCUMENT:

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